

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AON PLC, a United Kingdom public limited company, and AON GROUP, INC., a Maryland corporation,

Plaintiffs,

v.

MICHAEL HEFFERNAN, an individual, and ALLIANT INSURANCE SERVICES, INC., a Delaware corporation,

Defendants.

Case No. 16 CV 1924

(Jury Demanded)

**AON'S MOTION FOR LEAVE  
TO FILE UNDER SEAL**

Plaintiffs Aon plc and Aon Group, Inc. ("Aon"), by their attorneys DLA Piper LLP (US), respectfully move this Court under Local Rule 26.2 for leave to file Aon's Motion for Leave to Submit Additional Declarations and the Declarations of Jan Cottini and Matt Anacker under seal, and in support, state as follows:

1. At the hearing on February 4, 2016, the Court directed that a portion of the transcript identifying one of Aon's former clients be kept confidential.

2. On February 4, 2016, Aon filed a Motion for Leave to Submit Additional Declarations and the Declarations of Jan Cottini and Matt Anacker. Consistent with the Court's direction at the hearing, Aon redacted the name of the client in these documents.

WHEREFORE, Aon respectfully requests that this Court grant leave for Aon to file Aon's Motion for Leave to Submit Additional Declarations and the Declarations of Jan Cottini and Matt Anacker under seal.

Dated: February 4, 2016

Respectfully submitted,

AON PLC AND AON GROUP, INC.

/s/ John J. Hamill

One of Their Attorneys

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**CERTIFICATE OF SERVICE**

I, John J. Hamill, an attorney, hereby certify that on February 4, 2016, I caused the foregoing **Aon's Motion for Leave to File Under Seal** to be electronically filed with the Clerk of the Court using the CM/ECF System which will send notification of the filing to:

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/s/ John J. Hamill